

# **Exhibit 3**

May 31, 2019 email from Patrick  
Madden to Nick Widnell, Meghan  
Strong, et al.

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**To:** [Meghan Strong](#); [Stacey Grigsby](#); [Marcy Norwood Lynch](#); [William A. Isaacson](#); [Ross McSweeney](#); [Rory Skaggs](#); [Suzanne Jaffe Nero](#); [Richard Pocker](#); [Brent Nakamura](#); [dic@campbellandwilliams.com](#); [jcw@campbellandwilliams.com](#); [Nicholas Widnell](#)  
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**Subject:** Cung Le, et al. v. Zuffa LLC, 2:15-cv-01045 (D. Nev.) - Plaintiffs' Preliminary Objections to Zuffa's Exhibit List  
**Date:** Friday, May 31, 2019 5:38:32 PM  
**Attachments:** [2019-5-31 - UFC - Plaintiffs' Preliminary List of Exhibit Objections.xlsx](#)

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Nick and Meghan,

Pursuant to the Parties' agreement, Plaintiffs provide further information on the preliminary list of exhibits to which Plaintiffs object for reasons other than confidentiality designations. Plaintiffs attach the preliminary list of such exhibits, though reserve the right to object to additional exhibits.

First, Plaintiffs object to Zuffa introducing any of Zuffa's listed exhibits through Zuffa's experts where the expert did not rely on such exhibit(s) in his report(s).

Second, Plaintiffs object to Zuffa introducing at this evidentiary hearing any listed exhibit that concerns events, occurrences, or information that take place or cover a period after the end of the Class Period.

Third, Plaintiffs object to Zuffa introducing exhibits or other material that were not part of its arguments or analyses set forth in connection with Zuffa's Opposition to Plaintiffs' Motion for Class Certification.

Fourth, Plaintiffs object to Zuffa introducing its "Summary Exhibits."

Fifth, Plaintiffs object to Professor Topel's so-called "Supplemental 26(e) Expert Report" as untimely expert testimony.

Sixth, Plaintiffs object to Zuffa's exhibits Plaintiffs identified yesterday as not being sufficiently described to enable Plaintiffs to locate and review the exhibits.

Plaintiffs previously requested further information about several categories of exhibits yesterday and on Wednesday. Responsive information would be helpful in our ongoing meet and confer. I hope that you can provide the requested information soon.

We will speak with you next week.

Have a good weekend.